

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

ATTORNEY GENERAL OF TEXAS, and
SECRETARY OF STATE OF TEXAS,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, in his official
capacity as Secretary of Homeland Security, *et al.*,

Defendants.

No. 4:24-cv-49-DC-DF

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants United States Department of Homeland Security, Alejandro Mayorkas in his official capacity as Secretary of Homeland Security, Ur M. Jaddou, in her official capacity as Director of U.S. Citizenship and Immigration Services, and U.S. Citizenship and Immigration Services (collectively, "Defendants") respectfully move the Court for a 60-day extension of time to answer or otherwise respond to the Complaint, *see* ECF No. 1 ("Complaint"), from December 30, 2024 to February 28, 2025. The undersigned counsel has consulted with counsel for the Plaintiffs, who do not oppose the requested extension. In support of this Motion, Defendants state as follows:

1. On October 22, 2024, Plaintiff filed this action seeking to compel the Department to provide a response to Plaintiffs' voter citizenship inquiries. *See* ECF No. 1.

2. The Complaint was served on the United States Attorney for the Western District of Texas on October 31, 2024. As result, Defendants' deadline to answer or otherwise respond to the Complaint is December 30, 2024. *See* Fed. R. Civ. P. 12(a)(2).

3. Defendants respectfully request an extension of 60 days, until February 28, 2025, to answer or otherwise respond to the Complaint. Defendants respectfully submit that good cause exists to grant the requested extension: Defendants require additional time to obtain sufficient information to respond to the Complaint and to coordinate with the defending agency clients particularly in light of the upcoming holidays, undersigned counsel's pre-scheduled leave, and counsel's workload in other cases to which he is assigned. No previous extensions of time have been requested by Defendants in this matter.

4. Pursuant to Local Rule CV-7(G), the undersigned conferred with Plaintiffs' counsel, who do not oppose the relief sought herein. No trial date or other deadlines have been set in this case, and the granting of this extension will not impact any other deadline.

WHEREFORE, Defendants respectfully submit that the Court should grant the requested relief to extend the time within which Defendants must answer or otherwise respond to the Complaint by sixty (60) days, up to and including February 28, 2025.

Dated: December 9, 2024

Respectfully submitted,

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Special Counsel
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/s/ Stephen M. Pezzi
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